

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Western District of Texas

**FILED**

December 19, 2024

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXASBY: Erika Gonzalez  
DEPUTYUnited States of America  
v.

Luis Exiquio CARRILLO

Case No. **EP-24-M-5030-RFC***Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 12/18/2024 in the county of El Paso in the  
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

21 USC 952

Knowingly and intentionally, import into the United States, from the Republic of Mexico, to wit: approximately 4.70 lbs/2.14 kilograms of methamphetamine a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.Complaint sworn to telephonically on  
December 19, 2024 at 01:13 PM and signed  
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**

Sworn to before me and signed in my presence.

Date: 12/19/2024City and state: El Paso, Texas*Complainant's signature*

Juan C. Martinez, HSI Special Agent

*Printed name and title**Judge's signature*

Robert F. Castaneda, U.S. Magistrate Judge

*Printed name and title*

### AFFIDAVIT

On Wednesday, December 18, 2024, at approximately 0042 hours, Luis Exiquio CARRILLO applied for entry into the United States from Ciudad Juarez, Mexico, through the Ysleta Port of Entry in El Paso, Texas, which is within the Western District of Texas. CARRILLO was the driver and sole occupant of a 2023 white-in-color Dodge Charger, bearing Texas registration SWP-0785.

During primary inspection, Customs and Border Protection Officer (CBPO) Nickson Vilsaint obtained a negative customs binding declaration for drugs, tobacco, or firearms from CARRILLO. CARRILLO added he was bringing back a bottle of liquor. Due to a system generated alert, CARRILLO and the vehicle he was driving were referred to secondary for further inspection.

In secondary, CBPO Dina Holguin asked CARRILLO why he was being sent for secondary inspections and CARRILLO stated he had served time and been on probation for an offense that occurred fifteen years prior. CBPO Holguin asked CARRILLO what the year of his vehicle was, and CARRILLO stated either a 2023 or 2024. After verifying it was a 2023, CBPO Holguin instructed CARRILLO to drive through Z-Portal imaging system. At the conclusion of the vehicle being scanned, CBPO Holguin instructed CARRILLO to turn off the vehicle and initiated an inspection of the vehicle. CBPO Holguin asked CARRILLO again what he was bringing back from Mexico, CARRILLO again said nothing. During further inspection of the truck and rear passenger area, several grocery bags were found along with a glass handgun replica bottle of tequila. Canine Enforcement Officer (CEO) Pavel A. Caudillo began an inspection with his Narcotics/Human Detector Dog (NHDD) who alerted to the trained odor of narcotics coming from the exterior front bumper area of the vehicle. At this time, the Z-Portal operator, CBPO Juan Gomez stepped out and began to inspect the engine compartment area of the vehicle due to anomalies on the air filter box in the engine area of vehicle.

Further inspection of the 2023 Dodge Charger revealed two bundles wrapped with black tape found inside of inside the engine air filter box of the vehicle. One bundle was randomly selected, which field-tested positive for the characteristics of methamphetamine. A total of two bundles were removed from the compartment and weighed approximately 4.70lbs/2.14 kilograms (gross weight).

Homeland Security Investigations (HSI) Special Agent (SA) Juan Martinez and CBP Task Force Officer (TFO) Marilen Sommers arrived at the Ysleta Port of Entry and began an investigation. SA Martinez read CARRILLO his Miranda Statement of Rights in the English language as witnessed CBP TFO Sommers. CARRILLO acknowledged that he understood his rights and agreed to make a statement without the presence of an attorney. The interview was video, and audio recorded, and CARRILLO provided the following non-verbatim statement.

CARRILLO stated the vehicle had been provided to him on Tuesday, December 17, 2024, near

the intersection of Horizon Blvd. and Gateway East at approximately 1730 hours. CARRILLO suspected to be smuggling 125 grams of methamphetamine into the United States from Mexico. CARRILLO added that he was going to be paid \$1,000 United States Dollars. CARRILLO stated that once in the United States, he was instructed to drop off the vehicle with the key in the fuel tank at Americana Inn located at 14387 Gateway Blvd W., El Paso, Texas 79928. CARRILLO added that he agreed to smuggle the methamphetamine because he needed money for medical expenses. CARRILLO added this was his second time doing it.

I make this affidavit on the basis of my personal knowledge and information furnished to me by other law enforcement officers. Because this affidavit is being submitted for limited purpose of establishing probable cause as set forth herein, I have not included every fact known to me concerning this investigation.